

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Mar 21, 2023

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7 UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 BRYCE QUINTON HALE,

13 Defendant.

Case No.: 1:21-CR-2052-SAB-1

SUPERSEDING INDICTMENT

18 U.S.C. § 2251(a), (e)  
Production of Child Pornography  
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)  
Distribution of Child Pornography  
(Count 2)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)  
Receipt of Child Pornography  
(Count 3)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)  
Possession of Child Pornography  
(Count 4)

18 U.S.C. § 3147  
Penalty for an Offense Committed  
While on Pretrial Release

18 U.S.C. § 2253  
Forfeiture Allegations

29  
30 SUPERSEDING INDICTMENT - 1

## The Grand Jury charges:

COUNT 1

3        Between on or about August 2, 2021, and on or about August 6, 2021,  
4 within the Eastern District of Washington, the Defendant, BRYCE QUINTON  
5 HALE, did knowingly employ, use, persuade, induce, entice, and coerce Minor A  
6 to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for  
7 the purpose of producing a visual depiction of such conduct, knowing and having  
8 reason to know that such visual depiction would be transported and transmitted,  
9 using any means and facility of interstate and foreign commerce, and in and  
10 affecting interstate and foreign commerce; such visual depiction was produced and  
11 transmitted using materials that had been mailed, shipped and transported in and  
12 affecting interstate and foreign commerce by any means, including by computer;  
13 and such visual depiction was actually transported and transmitted, using any  
14 means and facility of interstate and foreign commerce, and in and affecting  
15 interstate and foreign commerce, in violation of 18 U.S.C. § 2251(a), (e).

## COUNT 2

17 On or about August 6, 2021, within the Eastern District of Washington, the  
18 Defendant, BRYCE QUINTON HALE, did knowingly distribute child  
19 pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been mailed, shipped  
20 and transported in and affecting interstate and foreign commerce by any means,  
21 including by computer, and that was transported via any means or facility of  
22 interstate and foreign commerce, to wit: still image and video files depicting minor  
23 and prepubescent children engaging in sexually explicit conduct, including but not  
24 limited to the lascivious exhibition of their genitals and pubic areas, as defined in  
25 18 U.S.C. § 2256(2)(A), all in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

## 1 COUNT 3

2 Between on or about June 5, 2022, and on or about January 6, 2023, within  
3 the Eastern District of Washington, the Defendant, BRYCE QUINTON HALE, did  
4 knowingly receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), that  
5 had been mailed, shipped and transported in and affecting interstate and foreign  
6 commerce by any means, including by computer, and that was transported via any  
7 means or facility of interstate and foreign commerce, to wit: still image and video  
8 files depicting minor and prepubescent children engaging in sexually explicit  
9 conduct, including but not limited to the lascivious exhibition of their genitals and  
10 pubic areas, as defined in 18 U.S.C. § 2256(2)(A), in violation of 18 U.S.C.  
11 § 2252A(a)(2)(A), (b)(1).

## 12 COUNT 4

13 On or about January 6, 2023, within the Eastern District of Washington, the  
14 Defendant, BRYCE QUINTON HALE, did knowingly possess material that  
15 contained one or more images of child pornography, as defined in 18 U.S.C.  
16 § 2256(8)(A), including images of prepubescent minors and minors who had not  
17 attained twelve years of age, the production of which involved the use of a minor  
18 engaging in sexually explicit conduct, and which visual depictions were of such  
19 conduct, that had been mailed, and shipped and transported using any means and  
20 facility of interstate and foreign commerce and in and affecting interstate and  
21 foreign commerce by any means, including by computer, and that was produced  
22 using materials that had been mailed, and shipped and transported in and affecting  
23 interstate and foreign commerce by any means, including by computer, in violation  
24 of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

## SENTENCING ENHANCEMENT

While the Defendant, BRYCE QUINTON HALE, was on pretrial release pursuant to an order dated December 1, 2021, from the United States District Court for the Eastern District of Washington, Case No. 1:21-CR-2052-SAB-1, and signed an advice of penalties which notified the Defendant of the potential effect of committing an offense while on pretrial release, the Defendant committed the offenses charged in Counts 3 and 4 of this Superseding Indictment, in violation of 18 U.S.C. § 3147.

## NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense or offenses in violation of 18 U.S.C. § 2251(a), (e); and/or 18 U.S.C. § 2252A(a)(2)(A), (b)(1), and/or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as set forth in this Superseding Indictment, the Defendant, BRYCE QUINTON HALE, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, including, but not limited to:

- a Quantum Fireball 3.5" hard disk drive, Serial Number 173002311914;
- a Quantum Fireball 3.5" hard disk drive, Serial Number 136918370881;
- a Toshiba Internal Disk Drive, Serial Number 855OT88LT;

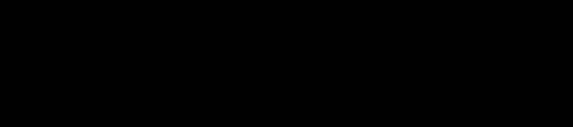
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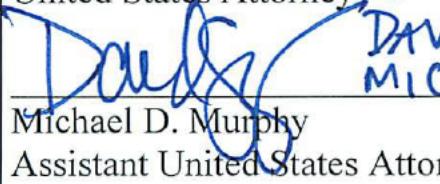
1 - a White Google Pixel 3 phone; and

2 - a Motorola Moto G Stylus phone.

3 DATED this 21st day of March 2023.

4 A TRUE BILL

5   
6  
7 Vanessa Waldref  
8  
9 United States Attorney

10   
11 DAVID HERZOG for  
12 Michael D. Murphy  
13 Assistant United States Attorney